

b.) Remarks

Claims 1-9, 11-13, 17-25, and 32 are pending in this application. Claims 1, 9, 11, 17, and 22 have been amended in various particulars as indicated hereinabove. Claims 10, 14-16, 26-28, 29-31 have been cancelled without prejudice or disclaimer.

Claims 29 and 31 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. And, claims 29 and 31 were rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. These rejections are now moot.

Claims 1, 2, 3, and 10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lin *et al.* USPN 6,269,402 in view of Primak *et al.* USPN 6,598,077. In related rejections, claims 11, 17-19, 22, 29 and 32 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lin *et al.* USPN 6,269,402 in view of Primak *et al.* USPN 6,598,077 and further in view of Canion *et al.* USPN 20020108059. These rejections are respectfully traversed for the following reasons.

Each of independent claims 1, 11, 17, and 22 require a router, or similar device between a client and a server, that determines whether a packet is destined for the server. The router forwards the packet, if it is not destined for the server. In contrast if it is destined for the server, the router makes a determination if the packet is part of a conversation and drops if it is not.

This system is useful for protecting certain targeted servers against attacks such as denial of service attacks.

The applied references neither show nor suggest the claimed invention. None of the applied references suggests a router that should make these types of determinations and then drop or forward packets as claimed.

Thus, withdrawal of these rejections is requested.

Claims 4-9, 12-13, 21, and 23-25 were rejected under 35 U.S.C. 103(a) as being unpatentable over Lin *et al.* USPN 6,269,402 in view of Bull *et al.* USPN 6,799,270 and Primak *et al.* USPN 6,598,077. This rejection is respectfully traversed for the following reasons.

The additionally cited Bull reference does not suggest the claimed router, for example, that forwards the packet, if it is not destined for a server of interest, but if the packet is destined for the server, the router makes a determination if the packet is part of a conversation and drops if it is not.

Thus, withdrawal of this rejection is requested.

Claims 14-16 and 26-28 were rejected under 35 U.S.C. 102(e) as being anticipated by Bull *et al.* USPN 6,799,270. This rejection is now moot.

Claims 30 and 31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bull *et al.* USPN 6,799,270 in view of Canion *et al.* USPN 20020108059. This rejection is now moot.

Applicants believe that the present application is in condition for allowance. A Notice of Allowance is respectfully solicited. Should any questions arise, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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